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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Mater Case No.: 3:07-cv-05944-SC
MDL No. 1917
Individual Case Nos.
3:11-cv-05513-SC;
3:13-cv-05264-SC

This document relates to:

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513-SC*

*Best Buy Co., Inc., et al. v. Technicolor SA, et
al., No. 13-cv-05264-SC*

*Target Corp. v. Chunghwa Pictures Tubes,
Ltd., et al., No. 3:07-cv-05514-SC*

*Target Corp. v. Technicolor SA, et al., Case
No. 3:11-cv-05514-SC*

*Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd.,
et al., No. 11-cv-05502-SC*

*Sears, Roebuck and Co., et. al. v. Chunghwa
Picture Tubes, Ltd., et al., No. 11-cv-5514*

**DECLARATION OF JILL S.
CASSELMAN IN SUPPORT OF
PLAINTIFFS' MOTIONS IN LIMINE**

Judge: Hon. Samuel Conti

*Sharp Electronics Corporation, et al. v.
Hitachi, Ltd., et al., No. 13-cv-01173-SC*

*Sharp Electronics Corp., et al. v. Koninklijke
Philips Electronics N.V., et al., No. 13-cv-2776
SC*

*ViewSonic Corporation v. Chunghwa Picture
Tubes, Ltd., et al., No. 14-cv-02510*

I, JILL S. CASSELMAN, declare as follows:

1. I am an attorney with the law firm of Robins Kaplan LLP, counsel for Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., and Bestbuy.com, L.L.C. (collectively “Best Buy”) in the above-captioned action currently pending in the U.S. District Court for the Northern District of California. I submit this declaration in support of Plaintiffs’ Motions *in Limine*. I have personal knowledge of the facts stated herein, and I could and would competently testify thereto if called as a witness.

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the deposition transcript of Brian Stone, dated December 3, 2012, and designated as “Highly Confidential.” (FILED UNDER SEAL.)

3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the deposition transcript of Nikhil Nayar, dated May 1, 2014.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the deposition transcript of Bonny Cheng, dated October 9, 2014.

5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the deposition transcript of Timothy Furey, dated July 30, 2014.

6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from the deposition transcript of James Smith, dated July 11, 2014, and designated as “Highly Confidential.” (FILED UNDER SEAL.)

7. Attached hereto as **Exhibit F** is a true and correct copy of Best Buy’s Responses and Objections to Defendants’ FRCP Rule 30(b)(6) Deposition Notice.

8. Attached hereto as **Exhibit G** is a true and correct copy of the Special Master's Report and Recommendations regarding Best Buy's Motion for a Protective Order, dated June 23, 2014.

9. Attached hereto as **Exhibit H** is a true and correct copy of the Court's Order Overruling Best Buy's Objection to the Special Master's Order.

10. Attached hereto as **Exhibit I** is a true and correct copy of Defendants' June 2, 2014 Opposition to Best Buy's Motion for a Protective Order and Cross-Motion to Compel Interrogatory Responses. (FILED UNDER SEAL.)

11. Attached hereto as **Exhibit J** is a true and correct copy of the European Commission's Provisional Decision in case AT.39437—TV and Monitor Computer Tubes, which is publicly available and can be accessed at

http://ec.europa.eu/competition/elojade/isef/case_details.cfm?proc_code=1_39437. All highlighting has been prepared by Plaintiffs in support of their Motion *in Limine* to establish the preclusive effect of the highlighted paragraphs.

12. Attached hereto as **Exhibit K** are true and correct copies of Exhibits 16a and 17 to the Report of Alan S. Frankel Ph.D. on behalf of Viewsonic.

13. Attached hereto as **Exhibit L** is a true and correct copy of excerpts from the deposition transcript of Rose Yang, dated November 7, 2014.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 13th day of February, 2015 in Los Angeles, California.

/s/ Jill S. Casselman
Jill S. Casselman